

**REMARKS/ARGUMENTS**

Favorable reconsideration and allowance of the present application are respectfully requested in view of the following remarks. Claims 1, 5-7, 17 and 19 remain pending, of which claim 1 is independent.

Claim 1 stands objected to for informalities. The claim is amended to address this issue. Applicants respectfully request that the objection to claim 1 be withdrawn.

In the Office Action:

- claims 1, 5, 7, 17 and 19 stand rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Takashima et al. (U.S. Patent No. 5,913,095) in view of Takashimizu et al. (U.S. Patent No. 5,743,518), and further in view of Norris (U.S. Patent No. 4,985,714); and
- claim 6 stands rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over Takashima et al. in view of Takashimizu et al., in view of Norris, and further in view of Ishikawa et al. (U.S. Patent No. 4,838,534).

Applicants respectfully traverse. As illustrated in Fig. 2 of the present disclosure, a coil spring 72 is arranged between the side wall member 71 and a side face of the image forming apparatus, which is located below the recording medium placement surface and is continuing from the downstream end portion in the recording medium discharge direction of the recording medium displacement surface. *See e.g., p. 17, line 29 – p. 18, line 2 of the specification.*

In contrast, the spring 96 of Norris is disposed between the strut assembly 64 and the tray 60, by coiling around the strut assembly 64 extending to the surface of the tray 60 from the upper end portion of the side wall 30. *See col. 5, lines 24-44; Figs. 1 and 2.*

Thus, the location of the spring 96 of Norris is completely different from the location of the coil spring as claimed in claim 1. In addition, the spring 96 of Norris is made of spring steel wire (e.g., see col. 5, lines 38-44) which is different from the coil spring of claim 1. Further, the configuration as recited in claim 1 is not described in any of the cited prior art references.

Therefore, independent claim 1 is distinguishable over any combination of Takashima et al., Takashimizu et al., Norris and Ishikawa et al. Claims 5-7, 17 and 19 are also distinguishable over the same references by virtue of their dependencies from independent claim 1 as well as on their own merits.

Applicants respectfully request that the rejection of claims based on applied references Takashima et al., Takashimizu et al., Norris and Ishikawa et al. be withdrawn.

All objections and rejections raised in the Office Action having been addressed, it is respectfully submitted that the present application is in condition for allowance. Should there be any outstanding matters that need to be resolved, the Examiner is respectfully requested to contact Hyung Sohn (Reg. No. 44,346), to conduct an interview in an effort to expedite prosecution in connection with the present application.

The Commissioner is authorized to charge the undersigned's deposit account #14-1140 in whatever amount is necessary for entry of these papers and the continued pendency of the captioned application.

Respectfully submitted,

**NIXON & VANDERHYE P.C.**

By: \_\_\_\_\_



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